

IN THE UNITED STATES BANKRUPTCY COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE

IN RE: )  
 )  
 ) Chapter 11 Proceeding  
AUTO RANCH, LLC, ) Case No. 314-08762  
d/b/a Family Campers ) Randal S. Mashburn, Judge  
 )  
 )  
Debtor-in-possession. )  
 )

**EXPEDITED MOTION FOR AUTHORITY TO SELL ASSETS AT AUCTION**

Comes the Debtor, through counsel, and respectfully moves this Honorable Court to grant it the authority to sell, via online auction, all assets of the above-referenced Bankruptcy estate and, further, requests an expedited hearing thereon. In support, the following shall be shown unto the Court:

1) ***RELIEF REQUESTED*** - The Debtor wishes to sell, via online auction, all remaining personal property assets of the above-referenced Bankruptcy estate pursuant to the terms and conditions set forth in the attached Auction Proposal. The Debtor operated Family Campers in Lebanon, Tennessee, a business that sold and repaired RVs and campers. The business closed in March and all floor planned inventory has already been repossessed by creditors.

The proposed auction is being held to sell all remaining inventory, parts and equipment at 101 Southside Park Drive, Lebanon, Tennessee. The auction shall dispose of all assets other than the DIP bank account and the potential proceeds from the ongoing lawsuit filed by the Debtor in Wilson County Circuit Court. The personal property is encumbered by blanket liens given to GE Commercial Distribution Financing Company, Wilson Bank and Trust and TCF Inventory Finance, Inc. There is no equity in the personal property, as the value of the property does not exceed the amounts owed on the debts to the secured creditors. Debtor is filing this Motion with the understanding that each secured creditor will need to consent to the proposed auction. Debtor believes that the auction will produce the best possible sales price for the remaining assets.

Notice of the proposed sale is given pursuant to Rule 2002(a)(2) of the Federal Rules of Bankruptcy Procedure. The purchasers shall not be insiders as defined by Section 101(13) and Rule 2014 of the Bankruptcy Code. The sale shall be free and clear of the interests of any lien holder; however, said lien will attach to the proceeds of the sale in accordance with the law of priority of liens. Closing shall be upon approval of the sale by the United States Bankruptcy Court for the Middle District of Tennessee.

2) ***REASONS FOR URGENCY*** - The building that housed Family Campers is owned by Nowling Holdings, LLC, which is also involved in a related bankruptcy proceeding given case number 14-08764. Relief from the automatic stay and abandonment of the real property was granted through an order entered on April 15, 2015 [Docket #43]. The building is currently under contract and set to be sold. The Debtor has no ability to move or store the remaining assets at another location and the auction must occur quickly in order to ensure that the assets are sold for the highest possible price before the real property is sold. Bidding for the online auction is scheduled to commence on May 26, 2015. This Motion needs to be heard on an expedited basis to allow the auction to take place as scheduled and avoid a postponement of the sale.

3) ***PARTIES RECEIVING NOTICE*** - Notice of this Motion will be sent to Beth Roberts Derrick, Assistant United States Trustee, Holly N. Knight, Attorney for GE Commercial Distribution Financing Company, Gene L. Humphreys, Attorney for Wilson Bank and Trust, Brian Hockett and David W. Houston, IV, Attorneys for TCF Inventory Finance and all parties of record to receive notice electronically via the U.S. Bankruptcy Court's CM/ECF filing system, on May 6, 2015. Notice of this Motion will be sent to the Debtor and all creditors and parties-in-interest pursuant to the attached mailing matrix, by U.S. Mail, postage prepaid, on May 7, 2015.

4) ***PROPOSED HEARING DATE*** - The Debtor requests that this matter be heard on May 19, 2015, at 9:00 a.m., in Courtroom 1, Second Floor, Customs House, 701 Broadway, Nashville, Tennessee.

WHEREFORE, the Debtor prays for the entry of an Order granting the relief sought herein, and that it be entitled to such other and further relief as is just.

Respectfully submitted,

LEFKOVITZ & LEFKOVITZ

**/S/ STEVEN L. LEFKOVITZ**

Steven L. Lefkovitz, No. 5953  
Attorney for Debtor  
618 Church Street, Suite 410  
Nashville, Tennessee 37219  
Phone: (615) 256-8300  
Fax: (615) 255-4516  
Email: slefkovitz@lefkovitz.com

**CERTIFICATE OF SERVICE**

I hereby certify that I have sent a true and exact copy of the foregoing to Beth Roberts Derrick, Assistant United States Trustee, Holly N. Knight, Attorney for GE Commercial Distribution Financing Company, Gene L. Humphreys, Attorney for Wilson Bank and Trust, Brian Hockett and David W. Houston, IV, Attorneys for TCF Inventory Finance, and all other parties of record to receive notice electronically via the United States Bankruptcy Court's CM/ECF system, this 6<sup>th</sup> day of May, 2015.

I further certify that I have sent a true and exact copy of the foregoing to the Debtor and all creditors and parties-in-interest pursuant to the attached mailing matrix, by U.S. Mail, postage prepaid, this 7<sup>th</sup> day of May, 2015.

**/S/ STEVEN L. LEFKOVITZ**  
Steven L. Lefkovitz



LOCATION OF PERSONAL PROPERTY, 101 SOUTHSIDE PARK DR., LEBANON, TN

## CONTENTS

- INTRODUCTION**
- OBJECTIVES**
- GENERAL PARAMETERS**
- CRITICAL PATH**
- PROPOSAL OPTION**
- COMPANY INFORMATION**

## Auction Proposal

For

### Complete Liquidation of Family Campers Lebanon, Tennessee

April 30, 2015

Ronald Nowling  
Family Campers  
101 Southside Park Dr  
Lebanon, TN 37090

Dear Mr. Nowling:

I am pleased to present this auction proposal for the complete liquidation of all remaining personal property owned by Auto Ranch, LLC located at 101 Southside Park Dr., in Lebanon, TN (the "Property") for your review and consideration. I appreciate you taking the time to meet me at the facility last week.

I have gathered sufficient information to produce the following auction proposal.

#### Objectives

- To maximize the net proceeds from the sale of the Property.
- To provide a complete accounting of auction results.



TOYOTA FORKLIFT

## EXCELLENT COMMUNICATION THROUGHOUT THE PROCESS

A project manager oversees each auction we conduct. He or she will submit a written status report to you each Monday from the contract date until the auction settlement.

### General Parameters

1. As your exclusive agent, we will advertise and conduct an online auction of the Property that will conclude on June 4, 2015 or some other mutually agreeable date.
2. The Property will remain in its current location. We will manage the auction from this location.
3. We will photograph, describe, and catalog the property. Descriptions and photographs will be available to potential bidders at [www.mclemoreauction.com](http://www.mclemoreauction.com).
4. The inspection will be open to the public. We will provide the staff required to manage the inspection.
5. We will provide the technology and accounting required to conduct an online auction of the property at [www.mclemoreauction.com](http://www.mclemoreauction.com).
6. We will mail you payment within 14 days of the conclusion of the auction.
7. We will collect and remit all applicable state and local sales taxes.
8. We will accept payment by credit and debit cards at the auction.
9. We will sell the property to the highest bidders, regardless of price at absolute auction.
10. After the conclusion of the auction, we will schedule a time for purchasers to pickup the Property. We will provide the staff required to manage the pickup and removal process.

## Critical Path

**May 1, 2015**

Proposal Accepted

**May 7, 2015**

Motion to Employ McLemore Auction Company and Motion to Sell  
Submitted to Bankruptcy Court

**May 14, 2015**

Orders Entered by Bankruptcy Judge

**May 19, 2015**

Signs Installed

**May 26, 2015**

Advertising Commences  
Bidding Opens at [www.mclemoreauction.com](http://www.mclemoreauction.com)

**June 3, 2015**

Scheduled Inspection Date

**June 4, 2015**

Auction Closes

**June 5, 2015**

Payment Deadline

**June 6, 2015**

Removal Deadline

**July 18, 2015**

Net Proceeds Mailed

## AN EFFECTIVE PLAN FROM BEGINNING TO END

The critical path is a working schedule for your auction project. Key deadlines are outlined in advance so we can gauge progress and allocate resources properly.



INVENTORY OF RV PARTS, ACCESSORIES AND SUPPLIES

## A LARGE AND LOYAL BUYER COMMUNITY

McLemore Auction Company, LLC has built the largest buyer community of any auctioneer in Middle Tennessee. More than 14,500 buyers receive the "This Week at McLemore Auction" email newsletter every Tuesday and approximately 35,000 unique individuals visit [mclemoreauction.com](http://mclemoreauction.com) each month.



STORAGE TRAILERS

### Proposal Option

In exchange for our efforts we will receive:

1. Ten percent (10%) of gross proceeds for vehicles—including cars, trucks, trailers, all-terrain vehicles, boats, aircraft, farm machinery and implements, and earth moving equipment; and
2. Twenty-five percent (25%) of the first \$40,000 of gross proceeds for other personal property and fifteen percent (15%) thereafter; and
3. A reimbursement for the actual costs of credit card processing for the auction.

This proposal is provided for your consideration and acceptance at or before 5:00 pm on May 7, 2015 after which time it may become necessary to postpone the proposed auction closing date.

Thank you for the opportunity to submit this proposal. I look forward to working for you.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Will McLemore".

Will McLemore  
President

# MCLEMORE

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## A U C T I O N C O M P A N Y , L L C



[www.mclemoreauction.com](http://www.mclemoreauction.com)

**McLemore Auction Company, LLC** is headquartered in Nashville, TN. Since it was founded in 2006, the company has sold real estate and personal property in throughout the Southeastern United States.

Recent real estate auction highlights include the disposition of more than 50 lots in the Village at Grandfather near Linville, NC for \$1.1 million, the sale of an 820 acre cotton farm in Cowan, TN for \$2.7 million and the complete liquidation of the Canyon West Golf Course and Mickle's Valley View Ranch in Weatherford, TX for \$4.8 million.

Since 2006, McLemore Auction Company, LLC has conducted more than 500 personal property auctions.

**Will McLemore, CAI****President of McLemore Auction Company, LLC**

A native of Nashville, Mr. McLemore holds a BA from Yale University in New Haven, CT.

He began his career in the auction business in the contemporary art department of a major international auction house based in New York. He went on to work for one of the largest real estate auction firms in the United States and for the largest industrial auctioneer in the world.

In 2006, Mr. McLemore founded McLemore Auction Company, LLC and opened its Nashville headquarters. He has sold more than \$75 million of real estate and personal property at auction.

Mr. McLemore is currently Chairman of the National Auctioneers Association Education Institute and serves on the Board of Directors of the National Auctioneers Association. He is a past President of the Middle Tennessee Auctioneers Group and is a member of the Greater Nashville Association of Realtors.

Mr. McLemore received the prestigious Certified Auctioneers' Institute (CAI) designation from the National Auctioneers Association Education Institute, in 2003.

Label Matrix for local noticing

0650-3

Case 3:14-bk-08762

MIDDLE DISTRICT OF TENNESSEE

Nashville

Mon May 4 16:31:37 CDT 2015

TN Dept of Revenue

c/o TN Attorney General's Office

Bankruptcy Division

PO Box 20207

Nashville, TN 37202-4015

Auto Ranch, LLC

101 Southside Park Drive

Lebanon, TN 37090-8847

GE Commercial Distribution Finance Corporati

Knight Law Firm

102 Woodmont Boulevard

Suite 200

Nashville, TN 37205-2216

701 Broadway Room 170

Nashville, TN 37203-3944

AIA Services, LLC

8148 Solutions Center

Chicago IL 60677-8001

AMERICAN EXPRESS

PO BOX 360002

FT LAUDERDALE FL 33336-0002

American Express Bank FSB

c/o Becket and Lee LLP

POB 3001

Malvern PA 19355-0701

Amerigas

926 Carthage Hwy

Lebanon TN 37087-4613

BANK OF AMERICA

PO BOX 26012

GREENSBORO NC 27420-6012

Bio-Kleen Products, Inc

810 Lake Street

Kalamazoo MI 49001-3045

CBS Outdoor

PO Box 33074

Newark NJ 07188-0074

Car Quest Auto Parts Stores

PO Box 404875

Atlanta GA 30384-4875

Cornerstone Information Systems, Inc

800 South Main St

Hopkinsville KY 42240-2112

Dominion Web Solutions

PO Box 3096

Norfolk VA 23514-3096

Emerald Body Shop Supplies

617 East Main St

Lebanon TN 37087-2874

Everlogic

6620 Southpoint Dr S

Ste 505

Jacksonville FL 32216-0963

Forest River, Inc.

21815 Network Pl

Chicago IL 60673-1218

GE Capital Solutions

2625 South Plaza Dr

Tempe AZ 85282-3375

Gallatin Fire Extinguisher, Inc

PO Box 103

Gallatin TN 37066-0103

Interstate Batteries

3729 Hwy 109 S

Lebanon TN 37087

Jayco Service Parts

PO Box 460

Middlebury IN 46540-0460

Jeanette Eakins, individually and as represe

6110 Whimbrelwood Drive

Lithia, FL 33547-4100

Lawson Products

PO Box 809401

Chicago IL 60680-9401

Lightning RV Supply

PO Box 448

Thonotosassa FL 33592-0448

Mountain Valley Water

24 Industrial Park Dr

Hendersonville TN 37075-2825

NTP DISTRIBUTION INC

THE COMMERCIAL AGENCY

C/O NTP DISTRIBUTION INC

POB 23909

PORTLAND OR 97281-3909

NTP Distribution

27150 SW Kinsman Rd

Wilsonville OR 97070-8246

Napa Auto Parts of Lebanon

1430 W Main St

Lebanon TN 37087-1323

Navistar RV, LLC

PO Box 465

Wakarusa IN 46573-0465

Nowling Holdings, LLC  
1714 Blairmont Drive  
Lebanon TN 37087-3041

OUTFRONT Media LLC fka CBS Outdoor  
c/o Szabo Associates, Inc.  
3355 Lenox Road NE, Suite 945  
Atlanta, GA 30326-1357

Pac-Van, Inc  
75 Remittance Dr  
Ste 3300  
Chicago IL 60675-3300

Recreational Web Services  
PO Box 358  
Sussex WI 53089-0358

Republic Services  
PO Box 9001099  
Louisville KY 40290-1099

Ronald & Gail Nowling  
1714 Blairmont Drive  
Lebanon TN 37087-3041

Royce A. Belcher, CPA  
420 W Main St  
Lebanon TN 37087-3502

Safety-Kleen Systems, Inc  
PO Box 650509  
Dallas TX 75265-0509

Skyline  
PO Box 217  
Bristol IN 46507-0217

TCF Inventory Finance, Inc.  
1475 East Woodfield Rd  
Ste 1100  
Schaumburg IL 60173-5616

TN DEPT OF REVENUE  
POB 190665  
NASHVILLE TN 37219-0665

TN Dept. of Revenue  
c/o Office of Attorney General  
Bankruptcy Division  
PO Box 20207  
Nashville, TN 37202-4015

The Angler Magazine of Mid TN  
2441-Q Old Fort Pkwy  
#341  
Murfreesboro TN 37128-4162

The Lamar Companies  
PO Box 96030  
Baton Rouge LA 70896-9030

Trailer Depot  
901 Cainsville Rd  
Lebanon TN 37087

US TRUSTEE +  
OFFICE OF THE UNITED STATES TRUSTEE  
701 BROADWAY STE 318  
NASHVILLE, TN 37203-3966

Unifirst Corp  
813 Massman Dr  
Nashville TN 37210-3701

WILSON BANK & TRUST  
PO BOX 768  
LEBANON, TN 37088-0768

WILSON BANK AND TRUST  
C/O GENE L HUMPHREYS  
BASS BERRY & SIMS  
150 3RD AVE S STE 2800  
NASHVILLE TN 37201-2017

BRAD SOLDWEDEL  
Individually and d/b/a Dunlap RV Centers  
684 Leather Gap Road  
Dunlap, TN 37327

GREG NOWLIN  
1722 Blairmont Drive  
Lebanon, TN 37087-3041

STEVEN L. LEFKOVITZ +  
LAW OFFICES LEFKOVITZ & LEFKOVITZ  
618 CHURCH ST STE 410  
NASHVILLE, TN 37219-2452

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)TCF Inventory Finance, Inc.

(u)WILSON BANK AND TRUST

(u)Open Range RV

(d) Jeanette Eakins, individually and as repre  
6110 Whimbelwood Drive  
Lithia, FL 33547-4100

End of Label Matrix		
Mailable recipients	51	
Bypassed recipients	4	
Total	55	